## ComEd's Proposed Implementation Plan Renewable Energy Portfolio Standard

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Today's Presentation – Details and Challenges
Technical Timeline for Wind Development
Acquisition Timeline for Wind RPS
Combined Timelines for Wind Development and RFP
Timeline Challenges
Timeline Summary
Product Segments
ComEd Proposes a 3-Segment Solicitation

Wind Product

ComEd purchases energy and RECs from up to 250 MW of wind projects located in IL for the initial RFP solicitation for delivery December 31, 2006

### Non-Wind Products (Quantity TBD)

- ComEd purchases energy and RECs from Tier I resources and RECs from Tier II resources for delivery beginning 2007
- Eligible resources located in IL for the initial RFP solicitation

#### Tier I Resources

- Landfill gas and digester gas to energy
- Biomass
- Small Hydro
- Solar

#### Tier II Resources

- Behind the meter renewable energy generators
- Includes net metering customers

Later solicitations may consider out-of-state resources. REC trading rules will be helpful.

#### **Cost Recovery**

- A cost recovery mechanism must be filed with the RFP program for ICC approval
  - PPAs entered into under an approved RFP program must be considered prudent for cost recovery
  - RFP design and administration costs incurred prior to 1/1/2007 must be accrued and amortized post-2006 per the approved mechanism
  - PPAs for energy and RECs entered into prior to ICC approval of the RFP program should be considered prudent if the all-in price is at or below the highest winning bid submitted in the RFP
  - Any RECs purchased prior to 12/31/2006 can be banked for future use and the costs accrued and amortized post-2006
- Results of the RFP will be reported to the ICC for market monitoring purposes
   Next Steps
- Begin selection process for independent manager to administer the RFP
- Solicit Request for Information from wind developers
  - Need to assess status of current projects
- Begin preparing RFP process
  - Prepare RFP Protocol
  - Prepare RFP Response Format
  - Develop selection criteria
  - Prepare standardized PPA

- Prepare RPS cost recovery mechanism
- Continued open dialog with all stakeholders

# **Appendix**

## **Proposed Terms**

# **Proposed Terms**

# **Wind Product**

- Delivery Points:

  - Facilities greater than 10 MW the generator bus
     Facilities 1 –10 MW interconnected at 34 KV, the generator bus
  - Facilities under 10 MW the ComEd Zone
- Target annual capacity factor of 32%
  - Supplier penalty for actual deliveries at less than 24% capacity factor equals difference between delivery at 24% and actual delivery X \$25/MWh
  - Penalties may be paid in the form of RECs from eligible wind resources
  - Actual performance in excess of 32% can be banked against future underperformance via a tracking account
- Contract term of 15 years
- Delivery term begins on or before 12/31/2006 for the first solicitation
- ComEd will pay only avoided cost for energy delivered prior to 1/1/2007 (generator retains RECs) unless ICC approves recovery for costs incurred prior to 1/1/2007
- Generators submit two bids: with and without a Federal PTC
- Pricing to be "back-end loaded" to mitigate near term rate impacts and allow maximum participation within customer impact constraints

### **Proposed Terms**

#### Non-Wind Products - Tier I Resources

- **Delivery Points:** 
  - Same as for wind
- Target capacity factor:
  - Generator will specify annual MWh production based on actual or expected production
  - Supplier penalty for actual deliveries at less than 75% of specified MWh equals difference between delivery at 75% and actual delivery X \$25/MWh
  - Penalties may be paid in the form of RECs from eligible resources
  - Actual performance in excess of specified production can be banked against future underperformance via a tracking account
- Contract term of 10 years
- Term begins on 1/1/2007 or during 2007 for first solicitation
- Clarify role of existing QSWEF contracts.

#### **Proposed Terms**

## Non-Wind Products – Tier II Resources (behind the meter)

- Target quantity of RECs:
  - Generator or aggregator will specify an annual quantity of RECs based on actual or expected production
  - Supplier penalties same as for Tier I Resources
  - No underperformance penalties assessed on facilities under 40 KW or aggregations of facilities under 40 KW
- Contract term of 3 years
- Term begins on 1/1/2007 or during 2007 for the first solicitation